



South Coast Air Quality Management District

Engineering & Compliance

*Policies &
Procedures*

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE

LOCAL COMMERCIAL AND COMMUNITY HEALTH

MEMORANDUM

DATE: July 29, 1997
TO: LCCH Permit Processing Staff
FROM: Jack Broadbent /s/ Jack
SUBJECT: Regulation XIII Implementation Guidance

To help ensure consistent implementation of Regulation XIII - New Source Review, this memo will provide guidance on the following topics:

1. Determining a Facility's Potential to Emit
2. Permit Conditions Limiting Emissions
3. Cyclical Operations

Determining a Facility's Potential to Emit

The District Counsel's Office has advised us that a facility's potential to emit includes emissions from permitted sources, fugitive emissions associated with permitted sources, and secondary emissions as defined by 40CFR Part 51 and Rule 1306(g), but excludes emissions from Rule 219 equipment. Pat Leyden's E-mail dated May 28, 1996 confirmed the exclusion of Rule 219 equipment and instructed staff to exclude permit exempt (Rule 219) equipment from a facility's potential to emit. This memo will expand on Pat Leyden's E-mail.

The definition of "potential to emit" in Rule 1302(y) indicates that, "Fugitive emissions associated with the source shall be included in the potential to emit." However, the rule does not provide guidance on how to determine if a fugitive emission is associated with a particular source. For coating and printing operations, we will consider any VOC emissions from non-permitted equipment to be fugitive emissions associated with the source (permitted equipment) if the activity generating the fugitive emissions is a routine and/or necessary activity in the coating or printing process which includes the permitted equipment. The activity generating the fugitive emissions may occur prior to or after the process occurring in the permitted equipment. For example, in most coating operations the permitted equipment is typically a spray booth. However, VOC emissions which are associated with the coating operation which occurs in the spray booth may come from non-permitted equipment such as:

1. An exempt spray gun (open spray equipment) may be used to apply primer to a part outside of the spray booth prior to the final topcoat being applied inside the spray booth.
2. The spray gun used within the spray booth may be cleaned outside of the spray booth in a gun cleaner which does not require a permit.
3. The part to be finished in the spray booth is cleaned with solvent by hand wiping outside of the spray booth.

Each of these three processes generates fugitive emissions associated with the coating process performed in the permitted spray booth and therefore should be included in the facility's potential to emit. Typically, all of the VOC at a small painting facility are a result of the either the painting operations within the spray booth or one or more of the three above described operations. By including the VOC emissions from these associated processes, we will avoid the potential of treating companies differently simply due to the fact that:

1. One company performs their surface preparation inside of their spray booth and another company performs their surface preparation outside of their spray booth, or
2. One company schedules their work to allow all coating operations to occur within their spray booth and another company opts to spray coatings in the open using exempt spray guns, or
3. One company cleans their spray gun inside of the spray booth while another company cleans their spray gun outside of the spray booth.

Typically, all of the VOC emissions at a small printing facility are from the printing operations, printing press clean-up, surface preparation prior to printing, or cleaning of the part after printing. All of these operations and emissions are associated with the permitted printing press and therefore should be included in the facility's potential to emit. Occasionally, a printing facility will have an exempt (Rule 219) printing press as well as one which requires a permit. Due to the nature of the printing jobs, the operations of the two presses may be totally independent. In these cases, the emissions associated with the exempt printing press should not be included in the facility's potential to emit in accordance with Pat Leyden's E-mail dated May 28, 1996.

Permit Conditions Limiting Emissions

Rule 1313(g)(2) specifies that every permit shall have a condition which limits the monthly maximum emissions from the permitted source. To comply with this requirement, each permit shall have a monthly limit which applies to the permitted equipment or the facility. Whenever a permit contains a condition limiting monthly mass emissions, be sure to include the required standard recordkeeping conditions designed to make the monthly limit more enforceable. The requirement in Rule 1313(g)(2) may also be met through the use of a condition which limits the daily maximum emissions since a daily limit also provides a monthly limit. If a daily limit is used, the additional recordkeeping conditions designed for monthly mass emissions limits are not required.

Rule 1304(d) exempts facilities from offset requirements if their potential to emit is less than the values provided in Table A (4 tons per year of VOC). In implementing this requirement, specify monthly emissions instead of annual emissions in a permit condition in order to comply with Rule 1313(g)(2).

Cyclical Operations

Some companies which operate on a cyclical schedule have requested that the ton per year exemption level in Rule 1304(d) be implemented for their facilities based on conditions limiting annual emissions instead of monthly emissions. Such requests cannot be honored since Rule 1313(g)(2) requires every permit to have a condition which limits the monthly maximum emissions. However, the monthly maximum emissions may be determined by dividing the annual emission exemption level by the number of operating calendar months provided the number of calendar months of operation per year are also limited by an enforceable condition and the resulting emissions comply with all of the other applicable rules and regulations.

If you have any questions regarding this memo, please discuss them with your manager.

JB:FEL:lgr

cc: Pat Leyden
Carol Coy
SSC Managers